UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

HUDA FAKHREDDINE, EVE TROUTT POWELL, and PENN FACULTY FOR JUSTICE IN PALESTINE,

No. 2:24-cv-01034 (MSG)

Plaintiffs,

v.

THE UNIVERSITY OF PENNSYLVANIA,

Defendant.

NOTICE OF RELATED CASE

Penn submits this notice to inform the Court of a related case filed in the Pennsylvania Court of Common Pleas of Philadelphia County, Trial Division, *Hilah Kohen, et al. v. Trustees of the University of Pennsylvania*, Case ID 240802104 (attached as Exhibit A). On behalf of Plaintiff Huda Fakhreddine and a Penn graduate student, Plaintiffs' counsel filed a Motion for Pre-Complaint Discovery under Pennsylvania Rule of Civil Procedure 4003.8, seeking discovery for "an action for infringement of Plaintiff's privacy rights under the Pennsylvania and U.S. Constitution, and breach of contract against the Defendant University." Ex. A at 3. The motion acknowledges the parallel tracks on which this litigation is proceeding. *See* Ex. A at 6 ("Fakhreddine ... is also a plaintiff in a federal case relying on federal question jurisdiction regarding the Information Letter.").

Dated: September 9, 2024

Respectfully submitted,

/s/ David Gringer

David Gringer (pro hac vice)
Alan Schoenfeld (pro hac vice)
WILMER CUTLER PICKERING
HALE AND DORR LLP
7 World Trade Center
250 Greenwich Street
New York, NY 10007
Telephone: (212) 230-8864
Facsimile: (212) 230-8888
david.gringer@wilmerhale.com
alan.schoenfeld@wilmerhale.com

Seth P. Waxman (pro hac vice)
WILMER CUTLER PICKERING
HALE AND DORR LLP
2100 Pennsylvania Avenue, NW
Washington, DC 20037
Telephone: (202) 663-6000
Facsimile: (202) 663-6363
seth.waxman@wilmerhale.com

Sean V. Burke Jason G. Canavan Office of General Counsel University of Pennsylvania FMC Tower at Cira Centre South 2929 Walnut Street, Suite 400 Philadelphia, PA 19104-5099 Telephone: (215) 746-5254 Facsimile: (215) 746-5222

Attorneys for Defendant University of Pennsylvania